

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF
ILLINOIS EASTERN DIVISION**

DAVID STAMER, on behalf of)	
himself and all others similarly situated)	
)	
Plaintiff)	Case No. 15-cv-8277
)	
v.)	Honorable Judge John J. Tharp
)	
SEAS & ASSOCIATES, LLC, ABC)	
FINANCIAL SERVICES, INC., and)	
BLAST FITNESS GROUP, LLC)	
)	
Defendant.)	JURY DEMAND

PLAINTIFFS' MOTION TO FILE RESPONSE UNDER SEAL

Plaintiff David Stamer, individually and on behalf of all others similarly situated, respectfully request this Court to allow him to file his Response in Opposition to Defendant ABC Financial Services Inc.'s Motion to Dismiss under seal. In support of this motion, Plaintiff states:

1. On September 21, 2016, Defendant ABC Financial filed a Motion to Dismiss Plaintiff's First Amended Complaint. Dkt. 52.
2. Plaintiff intends to file a Response to ABC' motion to dismiss that will cite from documents which Defendant Seas & Associates, LLC has designated as Confidential pursuant to the Protective Order entered in this case. Dkt. 27.
3. In particular, these documents contain an agreement between Defendant Seas & Associates, LLC & Defendant ABC Financial Services, Inc. and excerpts of the manual for the automated dialer jointly used by Seas & ABC.
4. A redacted copy of Plaintiff's proposed Response in Opposition to ABC Financial Systems Inc.'s Motion to Dismiss is attached hereto as Exhibit A.

5. This motion is not being filed for purposes of delay and will not prejudice the parties or the Court.

WHEREFORE, Plaintiffs respectfully request that this Court enter an order allowing Plaintiff to file his response to the motion to dismiss under seal.

Respectfully submitted,

By: /s/ Timothy J. Sostrin

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